

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS FAIR HOUSING  
CENTER; INTERMOUNTAIN FAIR  
HOUSING COUNCIL; SAN ANTONIO  
FAIR HOUSING COUNCIL, INC., d/b/a  
FAIR HOUSING COUNCIL OF SOUTH  
TEXAS; and HOUSING RESEARCH AND  
ADVOCACY CENTER, d/b/a FAIR  
HOUSING CENTER FOR RIGHTS &  
RESEARCH, INC., *on behalf of themselves  
and all those similarly situated,*

*Plaintiffs,*

v.

THE DEPARTMENT OF HOUSING AND  
URBAN DEVELOPMENT; SCOTT  
TURNER, *in his official capacity as  
Secretary of Housing and Urban  
Development*; U.S. DOGE SERVICE; U.S.  
DOGE SERVICE TEMPORARY  
ORGANIZATION; and AMY GLEASON, *in  
her official capacity as Acting Administrator  
of U.S. DOGE Service and U.S. DOGE  
Service Temporary Organization,*

*Defendants.*

Civil Action No. 3:25-cv-30041-RGS

Judge Richard G. Stearns

**PLAINTIFFS' PROPOSED BRIEFING SCHEDULE**

Plaintiffs intend to oppose Defendants' Motion to Dissolve the Temporary Restraining Order ("TRO") and Stay Proceedings, Dkt. 37 (hereinafter "Motion"). Defendants' Motion is based on the Supreme Court's two-paragraph per curiam order in *Department of Education v. California*, No. 24A910, 2025 WL 1008354 (U.S. Apr. 4, 2025). As Plaintiffs will address in their forthcoming opposition brief, important factual and legal distinctions render the outcome in that case inapplicable to the status of the TRO at issue in the case at bar. Most notably, Plaintiffs

here will suffer immediate and irreparable harm. Unlike the plaintiff states in the *Department of Education* case, who have committed to keeping the programs at issue running and have represented to the court that they have the “financial wherewithal” to do so, Plaintiffs will be unable to continue programming and will face other institutional harm—including staff layoffs, turning away clients, winding down programs, and complete closure—if the TRO is displaced. *Compare id.* (“Respondents have represented in this litigation that they have the financial wherewithal to keep their programs running.”), *with* Dkt. 5 and attachments thereto (laying out the harm Plaintiffs will suffer due to grant termination). This material distinction and others support leaving the TRO in place and permitting Plaintiffs’ claims to proceed, including both briefing on the propriety of a preliminary injunction and production of the administrative record.

Mindful of the timely nature of the issues presented in Defendants’ Motion, Plaintiffs propose filing an expedited opposition brief on or before April 14.

Dated: April 8, 2025

Respectfully submitted,

/s/ Lila Miller

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**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that I conferred with counsel for Defendants, who do not assent to the proposed briefing timeline.

Dated: April 8, 2025

/s/ Lila Miller  
Lila Miller

**CERTIFICATE OF SERVICE**

I, Lila Miller, hereby certify that that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing to be served upon counsel of record by email.

Dated: April 8, 2025

/s/ Lila Miller  
Lila Miller